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Joanna Ardalan, Esq. and One LLP

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
SOUTHERN DIVISION**

JOANNA ARDALAN, ESQ, an
individual; ONE LLP, a California
Limited Liability Partnership,

Plaintiff,

v.

DOE 1, d.b.a LAW INTEGRAL, LLC,
business entity unknown; DOE 2, d.b.a
DEPUTY TRADEMARK, business
entity unknown; DOE 3, p.k.a
MICHELLE SPRAGUE, an individual;
DOE 4, d.b.a TRADEMARK
INTEGRAL, business entity unknown;
DOE 5, d.b.a
BRANDREGISTRATION.ORG,
business entity unknown; and DOES 6
through 10, inclusive,

Defendants.

Case No. 8:23-cv-01243-KK-(DFMx)
Hon. Kenly Kiya Kato

**EX PARTE APPLICATION
REQUESTING EARLY
DISCOVERY**

1 Plaintiffs Joanna Ardalan and One LLP respectfully request that they be
2 permitted to conduct early discovery on the identity of the Defendants who
3 registered and operate the websites that are at issue in this case, lawintegral.com,
4 brandregistration.org, trademarkintegral.com, deputytrademark.com and a new
5 website that was registered five days after the filing of this lawsuit,
6 deputytrademarks.com, and the extent to which they schemed and deceived the
7 public while using Plaintiffs' goodwill.

8 Plaintiffs have served Defendants by email as permitted by the Court (Dkt.
9 18), but want to exhaust their ability to provide notice to Defendants.

10 Plaintiffs do not yet know the true identities of the Defendants but believe
11 they can be ascertained by issuing subpoenas to: 1) the registrar of the websites
12 they registered; 2) Zendesk, Inc. which is an online service that provides websites
13 with instant messenger capabilities; 3) credit card and payment processing
14 companies, such as American Express, Visa, Mastercard, Discover, Venmo, and
15 Paypal, all of which Plaintiffs understand Defendants use to process payment; 4) the
16 United States Patent and Trademark Office, which accepted payment from
17 Defendants for trademark registrations they fraudulently submitted.

18 Defendants registered lawintegral.com, brandregistration.org,
19 trademarkintegral.com, deputytrademark.com and, on information and belief,
20 deputytrademarks.com, and have chosen to cloak their identity. Ardalan Decl., Ex.
21 A, Ex. B. When Defendants registered their websites they should have provided the
22 service providers with real contact information that the registrar would be able to
23 provide to Plaintiffs under subpoena. Plaintiffs request that they be permitted to
24 issue a subpoena to the internet service providers to obtain the same. All of the
25 domains appearing in the complaint are registered with NameCheap, Inc. and use
26 the cloaking service Withheld for Privacy Ehf. The new website
27 deputytrademarks.com was registered on July 17, 2023, just five days after this
28

lawsuit was filed. Ardalan Decl., Ex. B. That website is registered with GoDaddy.com, LLC and cloaked by Domains by Proxy, LLC. *Id.*

Moreover, Defendants have used Zendesk, Inc. to provide an instant chat feature on its websites. Plaintiffs believe that Zendesk may also have information relating to the real identity of the Defendants.

Plaintiffs understand that Defendants accept all major credit cards and use payment processing companies Venmo and Paypal. Plaintiffs would like to subpoena them to ascertain Defendants' identities and the amount of money they have processed from their fraudulent scheme of providing legal services, including by using Plaintiffs' goodwill. Ardalan Decl. ¶ 5.

Finally, Plaintiffs request that they be permitted to subpoena the United States Patent and Trademark Office, which accepted payment from Defendants for trademark registrations they fraudulently submitted. Plaintiffs believe this discovery may also reveal who Defendants are and the number of registrations they fraudulently submitted under their scheme, as Plaintiffs understand that the payment was submitted by Defendants, not their purported "clients". Ardalan Decl. ¶ 6.

Because Defendants have not appeared, Plaintiffs would otherwise be unable to conduct discovery on these third parties. Plaintiffs respectfully request permission to issue subpoenas to NameCheap, Inc. GoDaddy.com, Inc., and their cloaking services, Withheld for Privacy Ehf, and Domains by Proxy, LLC, respectively, as well as ZenDesk, Inc., Venmo, Paypal, all major credit cards, including American Express and Visa, and the United States Patent and Trademark Office.

Respectfully submitted.

Dated: December 11, 2023

ONE LLP

By: /s/ Peter Afrasiabi
Peter Afrasiabi
Attorneys for Plaintiffs,
Joanna Ardalan, Esq. and One
LLP